

**Exhibit B**  
May Fee Application

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JJF)  
) (Jointly Administered)  
)  
Debtors. )

**VERIFIED APPLICATION OF WALLACE KING MARRARO & BRANSON FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES  
AS SPECIAL COUNSEL TO W. R. GRACE & CO., ET AL., FOR  
THE SECOND INTERIM PERIOD FROM MAY 1, 2001 THROUGH MAY 31, 2001**

Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Fed. R. Bankr. P. 2016, the Retention Order (as defined below), the Administrative Order Under 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the “Interim Compensation Order”) and Del.Bankr.LR 2016-2, the law firm of Wallace King Marraro & Branson PLLC (“WKMB”) as special litigation and environmental counsel for the above-captioned debtors and debtors in possession (collectively, “Debtors”) in connection with their chapter 11 cases, hereby

---

<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food ‘N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

applies for an order allowing it (i) compensation in the amount of \$244,726.00 for the reasonable and necessary legal services WKMB has rendered to the Debtors and (ii) reimbursement for the actual and necessary expenses that WKMB incurred in the amount of \$26,594.89 (the "Application"), in each case for the period from May 1, through May 31, 2001 (the "Fee Period"). In support of this Application, WKMB respectfully states as follows:

**Retention of WKMB**

1. On April 2, 2001 (the "Petition Date"), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases"). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On April 12, 2001, the office of the United States Trustee appointed (i) a committee of unsecured creditors in the Chapter 11 Cases (the "Creditors' Committee"), (ii) a committee of asbestos personal injury claimants (the "Asbestos Personal Injury Committee") and (iii) a committee of asbestos property damage claimants (the "Asbestos Property Damage Committee."). On June 18, 2001, the office of the United States Trustee appointed a committee of equity security holders (the "Equity Security Holders' Committee," collectively with the Creditors' Committee, the Asbestos Personal Injury Committee and the Asbestos Property Damage Committee, the "Committees").

2. By this Court's order dated June 21, 2001, the Debtors were authorized to retain WKMB as their special counsel, effective as of the Petition Date, with regard to environmental and litigation matters (the "Retention Order"). The Retention Order authorizes the Debtors to compensate WKMB at hourly rates charged by WKMB for services of this type and to be

reimbursed for actual and necessary out-of-pocket expenses that it incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

3. The Retention Order also allowed for a special fee arrangement with the Debtors in connection with a pending litigation matter, *Interfaith Community Organization v. Honeywell International, Inc. et al* ('Honeywell litigation'). By Agreement with the Debtors, WKMB is entitled to receive its full standard hourly rates until June 21, 2001 when its standard hourly rates billed for the Honeywell litigation will be reduced by 40% in return for an interest in the outcome of the Honeywell litigation.

4. As disclosed in the following affidavit:

Affidavit of Christopher H. Marraro in Support of Application for Order Under 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) Authorizing the Employment and Retention of Wallace King Marraro & Branson as Special Litigation and Environmental Counsel for the Debtors and Debtors in Possession (the "Original Affidavit"), filed June 4, 2001;

WKMB does not represent any interest adverse to the estates.

5. WKMB does not currently represent, but could in the future represent parties-in-interest in connection with matters unrelated to the Debtors and the Chapter 11 Cases. WKMB will update the Affidavits when WKMB becomes aware of material new information.

6. WKMB performed the services for which it is seeking compensation on behalf of or for the Debtors and their estates, and not on behalf of any committee, creditor or other person.

7. WKMB has received no payment for the services performed and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with these cases.

8. Pursuant to Fed. R. Bank. P. 2016(b), WKMB has not shared, nor has agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel and associates of WKMB, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

9. This is the second application for interim compensation for services rendered that WKMB has filed with the Bankruptcy Court in connection with the Chapter 11 Cases.

**Reasonable and Necessary Services Rendered by WKMB-- Generally**

10. The WKMB attorneys who rendered professional services during this Fee Period are:

<b>Name of Professional Person</b>	<b>Position with the applicant</b>	<b>Number of years as an attorney</b>	<b>Department</b>	<b>Hourly billing rate</b>	<b>Total billed hours</b>	<b>Total compensation</b>
Christopher Marraro	Partner	18 Years	Litigation	\$420.00	156.20	\$65,604.00
William Hughes	Counsel	10 Years	Litigation	\$305.00	220.80	\$67,344.00
Tamara Parker	Associate	8 Years	Litigation	\$260.00	112.10	\$29,146.00
Angela Pelletier	Associate	3 Years	Litigation	\$200.00	76.40	\$15,280.00
Letta Sneed	Associate	4 Years	Litigation	\$215.00	24.30	\$5,224.50
Alec Zacaroli	Associate	2 Years	Litigation	\$185.00	63.30	\$11,710.50
John Kampman	Counsel	15 Years	Litigation	\$350.00	1.20	\$420.00

11. The paraprofessionals of WKMB who have rendered professional services in these cases during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Barbara Banks	Paralegal	4 Years	Litigation	\$130.00	179.50	\$23,335.00
Darlene Boozer	Legal Clerk	1 Year	Litigation	\$95.00	18.00	\$1,710.00
Natasha Bynum	Legal Clerk	1.5 Years	Litigation	\$95.00	49.20	\$4,674.00
Keith Kaider	Paralegal	4 Years	Litigation	\$130.00	14.40	\$1,872.00
Mahmoude Moasser	Paralegal	10 Years	Litigation	\$130.00	3.40	\$442.00
Rebecca Mitchell	Paralegal	1.5 Years	Litigation	\$115.00	20.70	\$2,380.50
Tonya Manago	Senior Paralegal	5 Years	Litigation	\$130.00	40.70	\$5,291.00
Paul Pittman	Paralegal	2 Years	Litigation	\$115.00	58.60	\$6,739.00
Reilly Smith	Paralegal	6 Months	Litigation	\$115.00	30.90	\$3,553.50

Grand Total for Fees: \$244,726.00

12. WKMB has advised and represented the Debtors in connection with certain litigation and environmental matters. These matters include the Honeywell litigation, cost recovery litigation against other private parties and representation of the Debtors before the U.S. Environmental Protection Agency in connection with the Libby, Montana asbestos remediation matter.

13. The rates described above are WKMB's hourly rates for services of this type. Attached as Exhibit A is a detailed itemization and description of the services that WKMB rendered during this Fee Period. Based on these rates and the services performed by each individual, the reasonable value of such services is \$244,726.00. The WKMB attorneys and paraprofessionals

expended a total of 1069.70 hours for these cases during this Fee Period. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount of fees requested is fair and reasonable given: (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

14. Further, Exhibit A (a) identifies the individuals that rendered services in each Subject Matter, as defined and described below, (b) describes each activity or service that each individual performed and (c) states the number of hours (in increments of one-tenth of an hour) spent by each individual providing the services. Each numbered tab in Exhibit A corresponds to the matter number that WKMB assigned to each Subject Matter. If a Subject Matter does not appear, then WKMB did not bill time or expenses for that Subject Matter during this Fee Period, but may bill time for that Subject Matter in the future.

**Reasonable and Necessary Services Rendered by WKMB**

**Categorized by Matter**

15. The professional services that WKMB rendered during the Fee Period are grouped into the numbered and titled categories of subject matters described in Paragraphs 15-19 herein (the "Subject Matter(s)").

16. Matter 4 – Brewer Road Litigation

(Fees: \$195.00; Hours: 1.50 )

This Subject Matter describes services rendered in connection with litigation against Zotos International, Inc to recover several million dollars already expended by the Debtors in the environmental cleanup of a property in Western New York State.

17. Matter 5 – Motorwheel Superfund Site

(Fees: \$1,806.00; Hours: 4.50)

This Subject Matter involves time responding to issues relating to the amendment of a Consent Decree between the U. S. Environmental Protection Agency, the Debtors and other private parties concerning the Motorwheel Superfund Site located in Lansing, Michigan. Included is time related to advising the Debtors concerning the impact of the proposed amendment on their pending Third Circuit appeal and on future cost recovery actions against other responsible parties.

18. Matter 6 – Honeywell litigation

(Fees: \$237,937.00; Hours: 1052.30)

This Subject Matter involves time spent in litigation against Honeywell International, Inc. to recover substantial costs and damages and to compel Honeywell to clean up nearly a million tons of chromium process waste disposed of by a Honeywell predecessor, Mutual Chemical Company. Included is time preparing and filing motions, working on fact and expert discovery, undertaking factual and legal research and analysis and attending court hearings.

19. Matter 9 – Libby, Montana

(Fees: \$4,788.00; Hours: 11.40)

This Subject Matter describes activities concerning the representation of the Debtors before the U.S. Environmental Protection Agency relating to EPA's enforcement action concerning asbestos at Libby, Montana. Included is time for meetings with EPA and strategic planning.

**Actual and Necessary Expenses**

20. It is WKMB's policy to charge its clients in all areas of practice for identifiable non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. It is WKMB's policy to charge its



clients only the amount actually incurred by WKMB in connection with such items. Examples of such expenses are postage, overnight mail, courier delivery, transportation, overtime expenses, computer assisted legal research, photocopying, out-going facsimile transmissions, airfare, meals, and lodging. With respect to airfare expenses, all travel, by all individuals, is billed at the coach class rate with allowances for class upgrades.

21. WKMB charges: (a) \$0.15 per page for duplication and (b) \$0.75 per page for outgoing telecopier transmissions (plus related toll charges). WKMB does not charge its clients for incoming telecopier transmissions. WKMB has negotiated a discounted rate for Lexis and Westlaw computer assisted legal research, which is approximately \$125/hour of online use of the standard Westlaw databases and approximately \$3.00/minute for Lexis databases. Computer assisted legal research is used whenever the researcher determines that using Lexis/Westlaw is more cost effective than using traditional (non-computer-based legal research) techniques.

22. A summary of expenses by type, as well as a detailed itemization and description of the disbursements made by WKMB on the Debtors' behalf during the Fee Period is attached hereto as Exhibit B. All of these disbursements comprise the requested sum for WKMB out-of-pocket expenses, totaling \$26,594.89. These disbursements are grouped in Exhibit B into the same numbered and titled categories of Subject Matters as the fees are grouped in Exhibit A. The numbered tabs within Exhibit B correspond to the numbers assigned to the matters described in Paragraphs 15-19 herein. Any missing Subject Matters merely indicate that no expenses were attributed to such Subject Matters during the Fee Period, although expenses may be attributable to such Subject Matters in the future. A summary of expenses by category for the entire Fee Period is also set forth in Exhibit B.

**Representations**

23. WKMB believes that the Application is in compliance with the requirements of Del.Bankr.LR 2016-2.

24. Although every effort has been made to include all fees and expenses from the Fee Period in the Application, some fees and expenses from the Fee Period might not be included in the Application due to accounting and processing delays. WKMB reserves the right to make further application to the Court for allowance of fees and expenses for the Fee Period not included herein.

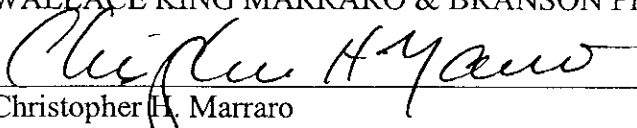
25. In summary, by the Application, WKMB requests compensation for fees and expenses in the total amount of \$271,320.89, consisting of (a) \$244,726.00 for reasonable and necessary professional services rendered and (b) \$26,594.89 for actual and necessary costs and expenses.

WHEREFORE, WKMB respectfully requests (a) that an allowance be made to it, as fully described above for the (i) 80% of the reasonable and necessary professional services WKMB has rendered to the Debtors during the Fee Period (\$195,780.80) and (ii) 100% of the reimbursement of actual and necessary costs and expenses incurred by WKMB during the Fee Period (\$26,594.89); (b) that both fees and expenses are payable as administrative expenses of the Debtors' estates; and (c) that this Court grant such further relief as is equitable and just.

Washington, D.C.  
Dated: July 5, 2001

Respectfully submitted,

WALLACE KING MARRARO & BRANSON PLLC

  
\_\_\_\_\_  
Christopher H. Marraro  
1050 Thomas Jefferson Street N.W.  
Washington, D.C. 20007  
(202) 204-1000

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JJF)  
) (Jointly Administered)  
)  
Debtors. )

**VERIFICATION**

Christopher H. Marraro, after being duly sworn according to law, deposes and says:


1. I am a partner with the applicant firm, Wallace King Marraro & Branson PLLC and I am a member in good standing of the bars of the State of New Jersey and the District of Columbia.

2. I have personally performed certain of, and overseen the legal services rendered by Wallace King Marraro & Branson as special litigation and environmental counsel to the Debtors and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and other persons in the firm.

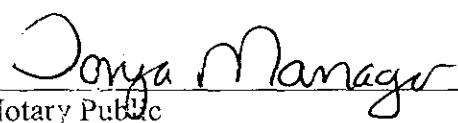
---

<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
Christopher H. Marraro

In the District of Columbia  
SWORN TO AND SUBSCRIBED  
before me this 5th day of July 2001.

  
Notary Public  
My Commission Expires:

**Tonya Manago**  
Notary Public, District of Columbia  
My Commission Expires 03-14-05

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et al</i>	)	Case No. 01-01139 (JJF)
	)	(Jointly Administered)
	)	
Debtors.	)	

**SUMMARY COVERSHEET TO FIRST MONTHLY INTERIM APPLICATION OF  
WALLACE KING MARRARO & BRANSON PLLC  
FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES FOR  
MAY 1, 2001 THROUGH MAY 31, 2001**

Name of Applicant:	Wallace King Marraro & Branson PLLC. ("WKMB")
Authorized to provide professional services to:	Special Litigation and Environmental Counsel to Debtors
Date of Retention:	April 2, 2001
Period for which compensation and reimbursement is sought:	May 1, 2001 through May 31, 2001.
Amount of compensation sought as actual, reasonable and necessary <sup>1</sup> :	\$195,780.80 for the period May 1, 2001 through May 31, 2001 (80% of \$244,726.00 in professional fees).
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$26,594.89 for the period May 1, 2001 through May 31, 2001.

This is a:      Monthly interim application.

The total time expended for fee application preparation is approximately 0 hours and the corresponding compensation requested is approximately \$0.00.

---

<sup>1</sup> This Application may not contain billings for all services rendered by members of Mahoney, or expenses incurred by Mahoney, to the Debtors during the Application Period. Mahoney reserves the right to seek compensation for such amounts in connection with future applications

Prior Applications Filed: There was a prior application filed for the period April 2, 2001 through April 30, 2001.

Summary of Compensation Requested

Name of Professional Individual	Position, year assumed, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Christopher Marraro	Partner	\$420	156.2	\$65,604.00
Angela Pelletier	Associate	\$200	76.4	\$15,280.00
William Hughes	Counsel	\$305	220.8	\$67,344.00
Tamara Parker	Associate	\$260	112.1	\$29,146.00
Letta Sneed	Associate	\$215	24.3	\$5,224.50
Alec Zacaroli	Associate	\$185	63.3	\$11,710.50
John Kampman	Counsel	\$350	1.2	\$420.00
Barbara Banks	Paralegal	\$130	179.5	\$23,335.00
Darlene Boozer	Legal Clerk	\$95	18.0	\$1,710.00
Natasha Bynum	Legal Clerk	\$95	49.2	\$4,674.00
Keith Kaider	Paralegal	\$130	14.4	\$1,872.00
Mahmoude Moasser	Paralegal	\$130	3.4	\$442.00
Rebecca Mitchell	Paralegal	\$115	20.7	\$2,380.50
Tonya Manago	Senior Paralegal	\$130	40.7	\$5,291.00
Paul Pittman	Paralegal	\$115	58.6	\$6,739.00
Reilly Smith	Paralegal	\$115	30.9	\$3,553.50

Total Fees \$244,726.00

Total Hours 1069.7

**EXPENSE SUMMARY**

Expense Category	Total Expenses
Airfare	\$1,688.78
Amtrak	\$180.00
Auto Rental	\$55.95
Delivery	\$299.37
Copies- Internal and Outside	\$8,780.43
Hotels	\$1,357.64
Facsimile	\$252.75
Lexis	\$1,962.59
Meals	\$804.87
Telephone	\$309.80
Fedex	\$1,326.64
Parking	\$10.00
Postage	\$24.24
Expert Consultant Retainer	\$500.00
Taxis/Miscellaneous Travel Expenses	\$405.22
Temporary Services	\$2,848.50
Westlaw	\$5,788.11

EXHIBIT A



**MATTER 4 - BREWER ROAD  
FEES - MAY 2001**

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007  
Phone 202.204.1000  
Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Professional Services Rendered in Connection with Waterloo - Brewer Road Site - Matter 4

Professional Services:

		<u>Hours</u>	
04/02/01 BB	Review new correspondence and documents and prepare for incorporation into existing case files	0.50	
04/16/01 BB	Place call to court reporter re deponent's corrections to 3/12/01 deposition transcript and prepare cover letter and Fed Ex package to court reporter for corrections for Mr. Hughes; prepare pertinent document and fax to Mr. Hughes in NY in re 4/17/01 deposition.	0.80	
05/01/01 BB	Consult with Mr. Zacaroli re request, prepare pertinent case information and email to Mr. Zacaroli for new Grace in-house counsel.	0.20	
			<u>Amount</u>
Total Fees		1.50	\$195.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	1.50	130.00

MATTER 5 - MOTOR WHEEL  
FEES - MAY 2001

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: Lydia Duff, Esq.  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Professional Services Rendered in Connection with the Motor Wheel Site - Matter 5

Professional Services:

		<u>Hours</u>	
04/16/01	JWK Review settlement documents ad proposed EPA agreement; confer with C. Marraro.	1.20	
05/01/01	CHM Review Consent Decree; conference call with M. Obradovich re same.	0.80	
05/03/01	CHM Conference call re Consent Decree.	1.20	
05/10/01	CHM Conference call on draft Consent Decree.	0.80	
05/16/01	CHM Conference with client re response from Goodyear.	0.50	
Total Fees		4.50	<u>Amount</u> \$1,806.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
John W. Kampman, Counsel	1.20	350.00
Christopher H. Marraro, Partner	3.30	420.00

MATTER 6 - HONEYWELL  
FEES - MAY 2001

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Professional Services Rendered in Connection with Honeywell Litigation - Matter 6

Professional Services:

		<u>Hours</u>
05/01/01	AP Review CERCLA Section 113 allocation cases.	2.80
	WH Continue 30(b)(6) deposition of Honeywell re heaving/geotechnical issues; confer with Mr. Valera re same; return travel to DC.	10.20
	MM Office conference with Ms. Pelletier re privileged documents and status of reports for various sites to be produced.	0.40
	BB Place call to NY State Dept. Bureau of Corporation re follow up on request for certificate of merger; research NY State Dept. of State Division of Corporations re historical information re pertinent corporation; quality check and prepare production documents and cover letter and FedEx boxes forwarding additional production documents and videotapes to case expert for incorporation into database and imaging project.	3.30

W. R. Grace &amp; Co.

Page 2

		<u>Hours</u>
05/01/01	FPP Review and integrate pleadings into existing case files.	1.20
	CHM Attend deposition of J. Wong in New Jersey.	9.50
	KK Update notebook of pre-purchase documents and enter into Summation.	2.00
	TP Reviewed chart of former employees with knowledge and list of prior depositions to identify transcripts that might be relevant to preparation for Hague deposition; email to B. Banks re getting Vasquez transcript; drafted letter to Mr. Caffrey re search of database for responsive documents.	1.10
	ACZ Research case law on whether knowledge of employee can be imputed to corporation (in CERCLA context in particular); discussions with L. Duff re updating Grace litigation files.	1.40
05/02/01	AP Conference with B. Hughes and A. Zacaroli re CERCLA research; review file of documents relating to Grace knowledge of chromium contamination.	4.40
	ACZ Additional research on inputted under N.J. law; research of N.J. agency law; research of N.J. corporate law; draft memo to C. Marraro, B. Hughes outlining issues; discussions with B. Hughes on NCP research.	7.10
	CHM Review Mutual documents; conference with experts; study Grace documents; prepare application for retention as special counsel.	8.50
	KK Update notebook and index of documents re pre-purchase contamination and building structural problems.	4.30

W. R. Grace &amp; Co.

Page 3

		<u>Hours</u>
05/02/01 BB	Continue research for pertinent corporate information re subsidiary or division for Mr. Marraro; quality check and correct pertinent document scanned into word re debtors application for Messrs. Marraro and Hughes; collect and prepare documents for Mr. Hughes' interview of potential expert; research Lexis, archived news, and Dun & Bradstreet, and place calls re same for verification of merger and acquisition information for pertinent companies for Mr. Marraro; collect information and prepare memo re case experts for Ms. Parker.	7.70
WH	Confer with paralegal re collecting Honeywell-DEP correspondence and other documents to be used by NCP expert; review same in preparation for meeting; confer with Ms. Koch re NCP issues; meet with Ms. Koch re retention as expert; confer with Mr. Marraro re depositions and NCP expert; confer with Ms. Parker re discovery disputes and letter to Mr. Field.	9.30
TP	Office conference with Mr. Marraro re obtaining documents relied upon by Grace experts and office conference with Ms. Banks re getting list of phone numbers for experts; reviewed privilege log list of other litigations from which responsive documents were withheld, met with Ms. Banks and Ms. Pelletier re what materials we have received from those litigations and drafted letter to Mr. Caffrey re documents from other litigation that have not been produced.	1.10



W. R. Grace &amp; Co.

Page 4

		<u>Hours</u>
05/03/01 KK	Review database and compile index of NJDEP-Allied correspondence; review reclassified non-privilege documents for pre-purchase issues.	5.10
ACZ	Additional research on imputed knowledge under N.J. law; research of case law; regulations on CERCLA NCP provisions and NCP consistency requirements.	5.30
BB	Consult with Ms. Parker re case experts; collect and prepare pertinent documents for Messrs. Marraró, Hughes and Agnello for meeting; research database and production documents for pertinent documents; place follow-up calls to USEPA Region 2 re FOIA request; review and analyze supplemental production documents, cross-reference against discovery requests and prepare memo to Ms. Parker re results; research privilege log for pertinent documents for Mr. Marraro; provide pertinent site information to case expert; prepare and fax pertinent letter to expert for Mr. Hughes; prepare cover letter and FedEx package to case expert for review.	9.00
MM	Office conference with Ms. Pelletier re status of various projects relating to privileged log and other search matters relating to reports of various sites; office conference with Ms. Manago re various duplicative privileged log material and storing of same.	0.90
WH	Review documents collected by Mr. Kaider re construction defects/chromium; meeting with Mr. Agnello and Mr. Marraro re case strategy.	8.60
LS	Legal research re strict liability claim and landowner's knowledge of potential contamination; read case opinions re strict	8.50

W. R. Grace &amp; Co.

Page 5

		<u>Hours</u>
	liability claim and landowner's knowledge of potential contamination; office conference with Mr. Hughes re legal research.	
05/03/01 AP	Meeting with J. Agnello regarding Daylin's earliest knowledge of chromium contamination and future strategy; review documents re same; conference with K. Kaider regarding project; conference with T. Manago re Grace defendants expenditures at the site.	6.80
CHM	All-day strategy meeting with J. Agnello; outline summary judgment motions and review case issues.	9.50
TP	Began calling all experts and explaining to them what materials we needed and any limitations that could be applied in copying portions of larger reports or documents where they relied on only one section; email to Ms. Banks requesting that she send Costa report to him so he could identify materials that need to be sent; began reading Mr. Vasquez deposition and noting points that need to be addressed in Hague deposition; additional phone calls with experts re sending materials they relied upon.	3.90
05/04/01 BB	Consult with Mr. Hughes re case expert mailing and documents to be sent from case expert; collect and prepare pertinent document re meeting with local counsel for Messrs. Marraro and Hughes; review and analyze new case documents and incorporate into case files; create new case files; collect and prepare pertinent documents for client review; prepare letters and documents and forward to counsel of record and new expert.	8.00

W. R. Grace &amp; Co.

Page 6

		<u>Hours</u>
05/04/01	CHM Meeting with J. Agnello continued; review privilege log issues; motion on license agreement.	7.00
	ACZ Discussion of CERCLA/NCP research with Bill Hughes.	0.40
	WH Meeting with Mr. Agnello and Mr. Marraro re case strategy, knowledge issue, trial, etc; prepare notices of deposition for Honeywell's experts; prepare application to bankruptcy court re WKMB fees; confer with Ms. Pelletier re depositions and work on summary judgment motions; review results of research on strict liability issues.	9.60
	LS Draft and revise argument for CERCLA re declaratory judgment and research strict liability issues.	8.40
	TP Email and office conference with Mr. Hughes on adequacy of 30(b)(6) deponent preparation and whether counsel can object to deposition questions on the basis that they are more appropriately addressed by contention interrogatories and westlaw searches on these issues; email and office conference with Ms. Pelletier re material we have from P. Coop and telephone conference with Coop's office re material we still need; began drafting deposition notices for all experts to be named by Honeywell on May 30th and printed out for Mr. Marraro's review.	4.70
	AP Call with P. Chapman regarding preliminary toxicity results; conference with K. Kaider regarding chromium notebook project; conference with T. Manago re paralegal review of documents.	4.40

W. R. Grace &amp; Co.

Page 7

		<u>Hours</u>
05/04/01	KK Review documents reclassified as not privileged and incorporate into "Hot Docs" binder.	0.70
05/06/01	WH Review Nov. 2000 Mueser Rutledge report re heaving issues.	0.60
05/07/01	KK Add documents and summaries to index of pre-purchase list document binder.	2.30
AP	Review documents for potential production and elimination of non-responsive or duplicative documents; supervise B. Mitchell, R. Smith and B. Banks re same.	8.00
TM	Meeting with Ms. Pelletier and Ms. Banks regarding upcoming case assignments and need for assistance on the Grace document production; organized case files; labeled red-wells and updated case index.	3.60
ACZ	Additional research of NCP regulations, case law; discussion with B. Hughes regarding same.	2.90
BB	Place follow-up calls re arrangements for USEPA Region 2 FOIA response documents re site; analyze defendants' discovery responses, cross-reference against production databases and prepare summary for Ms. Parker; place call to case expert re database search and documents for new expert's review; place call to new expert re same; consult with Ms. Parker and Ms. Pelletier re case projects; research production documents and cross-reference potential additional documents in preparation for supplemental document production.	8.20
TP	Finalized deposition notices based on Mr. Hughes' drafts, drafted cover letter and sent out to Messrs. Caffrey and Field; telephone	4.90

W. R. Grace &amp; Co.

Page 8

Hours

conference with Mr. Coop's office, Dr. Anderson's office and Dr. Costa's office re materials that need to be gathered and sent; attempted to reach Mr. Kanter and Mr. McGuire and left messages; continued research re obligation to produce additional 30(b)(6) deponent if one proffered is not knowledgeable on all issues and on whether 30(b)(6) deponent can be asked to respond to questions related to contentions and began drafting letter to Honeywell on these issues.

05/07/01	CHM	Review 30(b)(6) deponent issues; draft letter to D. Field re 30(b)(6) witness; conference with investigator; meetings with team re various issues on expert discovery.	4.80
	WH	Legal research re moving for summary judgment on RCRA imminent and substantial endangerment claim; confer with Mr. Zacaroli re research assignments in connection with same; confer with Ms. Parker re research on NCP issue in connection with CERCLA summary judgment motion; review Mr. Marraro's re-draft of CERCLA motion.	6.10
05/08/01	RLS	Continue to conduct a review of database documents to discern whether documents had been produced previously in connection with expert reports.	10.10
	ACZ	Research of RCRA case law on commencement of citizen suits for motion to dismiss RCRA claim; research of federal pleading requirements on issue of whether Honeywell can plead imminent and substantial endangerment under RCRA without admitting it; discussion with B. Hughes re same.	5.10

W. R. Grace &amp; Co.

Page 9

		<u>Hours</u>
05/08/01	WH	
	Review documents in preparation for Emil Walerko's deposition; continue research re RCRA summary judgment motion; review and collect documents to be used in support of RCRA motion; confer with Ms. Pelletier re assignments; confer with Mr. Marraro re motions and expert discovery matters; confer with Ms. Koch re her review of documents in connection with NCP issue and rebuttal to Delaney report.	10.60
	TM	
	Reviewed and copied selected production documents; reviewed and analyzed new case documents and incorporate into case files; organized case files; meeting with Ms. Pelletier and Ms. Mitchell regarding production discrepancies; assisted with the review of correspondence to check on production of WRG and GRA bates documents; copied documents; reviewed and analyzed new case documents and incorporate into case files; organized case files.	6.90
	AP	
	Review of formerly privileged documents and "WRG" documents for potential production; conference with R. Smith and B. Mitchell re same.	5.90
	RM	
	Discuss with Ms. Pelletier and Ms. Manago produciton discrepancies; review correspondence to check on production of WRG and GRA bates documents; arrange for copying of WRG documents for review for inclusion in production; review WRG documents and compare to database to check for duplicates of already produced documents; make notations on duplicative documents, documents to be reviewed on CD and notations on corrections to database entries.	8.30

W. R. Grace &amp; Co.

Page 10

		<u>Hours</u>
05/08/01 BB	Research production files and database and cross-reference additional documents in preparation for supplemental production; collect and prepare pertinent documents for Messrs. Marraro and Hughes; consult with Mr. Hughes re assignment in preparation for response to defendant's motion to amend its crossclaims; analyze, sort and organize pertinent correspondence prepared by case expert for review by new case expert for Mr. Hughes.	7.30
TP	Completed draft of letter re need to produce additional 30(b)(6) deponent and indicated need for cites to transcripts to support argument; office conference with Mr. Marraro re preparing letter to Honeywell counsel on what documents were produced from prior litigations and demanding that all be produced; reviewed correspondence.	6.90
05/09/01 AP	Draft letter to David Field regarding expert documents.	0.30
WH	Legal and factual research in support of RCRA, CERCLA and Spill Act summary judgment motions; work on drafting same; review and collect documents to be used in support of summary judgment motions; confer with Mr. Zacaroli re research assignments.	8.60
TM	Meeting with Ms. Pelletier regarding response summary project; reviewed and analyzed invoices in order to prepare report summary to determine payments to vendors for the environmental clean up etc.; drafted report summary; meeting with Ms. Pelletier regarding the findings.	7.30

W. R. Grace &amp; Co.

Page 11

		<u>Hours</u>
05/09/01 RM	Review WRG documents and compare to database to check on possible duplicates already produced, make notations on duplicate documents, documents to be compared to scanned version and notations for corrections to database entries; confer with Mr. Smith, Ms. Banks and Ms. Pelletier	7.00
BB	Review produced documents for pertinent witness information for Mr. Marraro; analyze, sort and organize pertinent correspondence prepared by case expert for review by new expert for Mr. Hughes; prepare binders of documents, cover letter and FedEx and delivery to FedEx after hours.	10.60
ACZ	Research for motion to dismiss Honeywell's amended crossclaims on judicial estoppel and pleading imminent and substantial endangerment under RCRA; futility under FRCP 15; dismissal requirements under FRCP 12(b)(6); pleading requirements under FRCP 8; drafted argument language for B. Hughes; discussion with B. Hughes regarding research.	9.30
RLS	Continue reviewing the Allied privilege documents to discern whether they had been produced previously.	3.40
CHM	Lengthy conference call with I. Moe and prepare retention letter as consulting expert; conference with investigator re various experts; review documents in preparation for summary judgment motion; work on CERCLA section 113 motion; review transcripts from first Wong deposition; prepare letter to D. Field.	9.00
TP	Research re delay in seeking to amend pleading after deadline in scheduling order and taking inconsistent positions in pleading and drafted	8.70



W. R. Grace &amp; Co.

Page 12

Hours

memo to file listing Honeywell documents recently produced and whether they are arguably responsive to Grace's Fourth Request to Produce and to which individual requests they are responsive to; office conference with Ms. Banks re searching for documents related to other litigations that have been produced by Honeywell for purpose of identifying what documents they have not yet produced.

05/10/01	DB	Case maintenance and labeled case files, re-filed documents	2.00
	AP	Conference with B. Mitchell re expert document reviews; review correspondence re same.	0.40
	ACZ	Additional research for motion to dismiss Honeywell's amended crossclaim, on pleadings containing built-in defenses, failure of proof issues and additional Third Circuit case law on Rule 12(b)(6) motions.	4.10
	BB	Collect and prepare pertinent documents for Mr. Hughes; research production database, analyze production documents, and prepare analyses of litigation-related production documents produced by defendant for Mr. Marraro; research EPA Superfund site re verification of EPA ID # for site.	9.70
	FPP	Locate and compare paper documents to documents located on compact disc to ascertain whether documents have been produced for determination of expert production; converse with Ms. Mitchell and Ms. Banks regarding assignment; scan documents for Mrs. Banks for use by Mr. Marraro.	3.80

W. R. Grace &amp; Co.

Page 13

		<u>Hours</u>
05/10/01 RM	Review documents and compare to CD image to reduce production; discuss with Mr. Pittman & Ms. Banks CD information and project	3.40
CHM	Meeting with plaintiffs re joint efforts; conference with plaintiffs and defendants re summary judgment briefing schedule; conference with Langan Engineering re report and offsite disposal; conference with Grace re EPA ID#; work on CERCLA Section 113 motion.	8.00
RLS	Continue the review of documents.	1.50
TP	Read cases for opposition to motion to amend and highlighted portions for use by Mr. Hughes in brief; office conference with Mr. Hughes re scheduling depositions; email and telephone conference with Mr. Caffrey re scheduling Hague deposition and Wong deposition; email to Messrs. Marraro and Hughes re potential deposition dates; tentative arrangements made for travel for deposition; email with Ms. Banks re confirming deposition schedule; telephone conference with Mr. Davis re documents sent and his concerns re lack of payment and email to Mr. Hughes re same; email to Ms. Banks listing categories of documents requested in Grace's Fourth Request for Production for which I could not identify any responsive documents in recent production and requested that she confirm that no documents of these types had been produced and email re searching database to get list of documents produced from other litigation; email with Court reporter and telephone conference with same re obtaining the proper transcripts; telephone conference with all Grace experts who have not yet sent all documents.	8.90

W. R. Grace &amp; Co.

Page 14

		<u>Hours</u>
05/10/01	WH Review Honeywell's motion to amend cross-claim to add RCRA claim; confer with Mr. Marraro re same; research in support of opposition to motion to amend; work on RCRA summary judgment motion and confer with Mr. German re same and upcoming depositions; review Ms. Parker's draft letter re insufficiency of Honeywell's 30(b)(6) deponents.	9.40
05/11/01	WH Factual and legal research in support of opposition to Honeywell's motion to amend cross-claims; confer with Mr. Marraro and Mr. Agnello re same; begin drafting opposition brief; continue work on RCRA motion for partial summary judgment; review additional RCRA cases provided by Mr. Zacaroli regarding proof of imminent and substantial endangerment under RCRA § 7002.	8.80
	RM Discuss with Ms. Pelletier document requirements for production; discuss with Mr. Smith timeline for project.	0.40
	AP Call with S. German re Stipulation as to imminent, substantial endangerment and regarding document production issues; review documents for production; call with P. Coop re documents.	3.00
	CHM Conference with W. Hughes re opposition brief to Motion to Amend; conference with experts re rebuttal reports; conference with Kirkland & Ellis re lifting stay in Chapter 11 proceeding; review correspondence.	3.80
	MM Conference with Mr. Hailu re continue search of Grace databases for reports relating to sites 15, 120 and 157.	1.20

W. R. Grace &amp; Co.

Page 15

		<u>Hours</u>
05/11/01 BB	Consult with Mr. Hughes re preparation for 5/15/01 deposition; collect and prepare deposition exhibits; collect and prepare pertinent documents for Mr. Marraro and Ms. Pelletier; analyze database of defendant's production re litigation-related documents and prepare memo and database excerpts for Mr. Marraro.	6.10
TP	Completed research on opposition to motion to amend and gave to Mr. Hughes; read deposition of Mr. Wong and compared to Notice for 10(b)(6) deposition to identify cites to show need to proffer an additional deponent and read transcript for Mr. Kyle and compared subjects on 30(b)(6) notice and added the factual argument to draft letter demanding additional deponent; telephone conference with Mr. Caffrey and drafted letter to Mr. Caffrey confirming deposition schedule; office conference with Mr. Hughes re information needed by Ms. Porter re counsel in all cases for purpose of Grace bankruptcy and emailed this information to Ms. Porter along with answers to other inquiries from her; telephone conference with Mr. Coop's office regarding what materials were to be sent; arranged for travel for deposition.	7.90
RLS	Conduct document review; pull duplicates; create a duplicate file.	6.90
ACZ	Additional research for motion to dismiss Honeywell's amended crossclaim, on futility of claim issue under FRCP 15, failure of proof, review of deposition of J. Wong for evidence of futility of Honeywell's claim; drafted outline of relevant language and email on research for B. Hughes.	6.90

W. R. Grace &amp; Co.

Page 16

		<u>Hours</u>
05/11/01	DB Case maintenance and labeled case files, re-filed documents	8.50
	FPP Locate and compare paper documents to documents located on compact disc to ascertain whether documents have been produced; locate and compare paper documents to documents located in specified notebooks to ascertain whether documents were produced.	5.50
05/12/01	WH Finish drafting Grace's opposition to Honeywell's motion to amend cross-claims and finalize for review by Mr. Marraro; begin reviewing transcripts of Mr. Walerko's prior depositions in preparation for 5/15 deposition.	8.60
	CHM Review and edit Opposition to Motion to Amend.	3.00
05/13/01	WH Review documents in preparation for Mr. Walerko's deposition on 5/15; finish reviewing transcripts of Mr. Walerko's prior depositions.	6.80
	LS Legal research re continuing tort; draft summary of legal research re continuing tort.	2.60
05/14/01	ACZ Review of draft opposition to Honeywell's motion to dismiss for B. Hughes; further research of case law on treatment of inconsistent claims, other issues related to opposition brief; make final changes to brief; assemble all relevant exhibits for J. Agnello.	6.50
	NAB Organized and label documents sent to expert Gayle Cook; file and index case documents.	5.00
	AP Telephone conference with plaintiff's counsel regarding documents; review of Walerko preparation documents for production to plaintiffs; conference with B. Mitchell re	1.60

W. R. Grace &amp; Co.

Page 17

		<u>Hours</u>
	preparation of additional documents for production to Allied.	
05/14/01 FPP	Convert expert report into electronic format; extract color photos for conversion into electronic format.	2.00
WH	Finish preparing for Mr. Walerko deposition; confer with Ms. Pelletier re finalizing opposition to motion to amend.	10.80
LS	Office conference with Mr. Hughes re continuing tort theory; legal research re continuing tort theory.	1.30
CHM	Outline expert and summary judgment strategy; review documents; phone meetings with witnesses; conference with experts; final review of opposition to Motion to Amend; conference with J. Agnello.	8.00
FPP	Locate and compare paper documents to documents located in specified notebooks to ascertain whether documents were produced.	3.40
RLS	Finish review of documents.	2.50
BB	Review, analyze, prepare and incorporate new correspondence into indexed case files; research case files and prepare pertinent documents for Mr. Marraro; prepare exhibits for 5/15/01 deposition for Mr. Hughes; place calls and send emails re rearrangement for May 2001 deposition coverage; research indexed case files, collect and prepare exhibits to opposition to motion for leave to amend cross-claims for Messrs. Hughes and Zacaroli; place call to counsel of record re 5/15/01 deposition confirmation; consult with Ms. Parker and Mr. Marraro re litigation-related	9.30

W. R. Grace &amp; Co.

Page 18

Hours

	documents produced by defendant; collect pertinent litigation-related documents from CD for Mr. Marraro; summarize and update deposition scheduling needs for Messrs. Hughes and Zacaroli; place calls to case expert to arrange additional deposition preparation materials to remaining depositions.	
05/14/01 RM	Confer with Mr. Pittman regarding W.R. Grace documents compared to already produced and scanned documents; confer with Ms. Pelletier regarding questions on specific documents.	0.60
TP	Telephone conferences with Dr. Anderson's office re obtaining support for her opinions and arranging to have materials picked up by courier; reviewed documents received, follow-up phone calls to experts to request documents, and sent email to Mr. Marraro summarizing the status of each experts production and/or commitments to send documents; reviewed 30(b)(6) deposition notices sent to Honeywell and matched the subjects with testimony by Mr. Wong and Mr. Kyles on issues that they were unable to provide testimony and drafted letter on this issue to Honeywell counsel.	6.80
05/15/01 ACZ	Discussions with M. Flax; arrange to provide order denying Allied's second amended cross claim.	0.30
NAB	Print documents from database requested by Mr. Marraro; file, index and scan correspondence.	7.00

W. R. Grace &amp; Co.

Page 19

		<u>Hours</u>
05/15/01 AP	Telephone conference with Plaintiff's counsel regarding Stipulation of "imminent and substantial endangerment;" call with P. Coop regarding Ensafé files.	2.30
TP	Checked expert documents against list of items relied upon in expert reports, called experts re missing documents and sent email to Mr. Marraro re status of document production; drafted cover letter and sent out documents of Hugh McGuire to Honeywell counsel; office conference with Mr. Marraro re document from Coop's survey.	6.10
WH	Take Mr. Walerko's deposition; return travel to DC.	11.40
FPP	Convert expert report into electronic format; extract color photos for conversion into electronic format.	8.50
BB	Consult with Mr. Marraro and Ms. Parker on preparation and production of supporting documents for case experts' reports; process and prepare pertinent documents from electronic files for Mr. Marraro's review; organize and prepare supporting documents for expert reports for production; analyze information in deposition transcripts and documents re former employee of defendant in preparation for deposition; research production database and place telephone call and send email message to case expert re same for Mr. Marraro; read and sort new correspondence and documents and prepare for incorporation into case files.	6.80
CHM	Prepare for 30(b)(6) deposition; prepare summary judgment brief re Section 107 liability; meetings with team re production of	9.50



W. R. Grace &amp; Co.

Page 20

		<u>Hours</u>
	documents; conference with investigator and review investigator reports.	
05/16/01 WH	Confer with Mr. Marraro and Ms. Pelletier re discovery issues and summary judgment briefing; work on motion for partial summary judgment on RCRA claim; confer with Mr. Goad re technical issues in connection with RCRA motion; review NJDEP guidance documents re soil cleanup standards for chromium.	8.80
MM	Review e-mail received from Ms. Pelletier re recently received deposition notice and document demands relating to each of our experts (i.e., ICO and Grace expert witnesses); review correspondence and stated depositions received from Mr. Boenning; review case calendar reflecting the stated deposition notices.	0.40
LS	Legal research re Honeywell's duty to warn the public; office conference with Mr. Marraro and Mr. Hughes re summary judgment briefing and legal research on duty to warn the public.	3.50
BB	Prepare documents sent to new case expert for attorney review for Mr. Hughes; collect pertinent document for Messrs. Marraro and Hughes; respond to inquiry from case expert regarding deposition preparation request; consult with Ms. Parker and Mr. Hughes and prepare amended deposition notices to defendants experts; review, prepare and produce supporting documents to expert reports; arrange for preparation of documents for expert deposition for Mr. Hughes; review, organize and prepare new case filings for incorporation into indexed case files and create new file.	10.50

W. R. Grace &amp; Co.

Page 21

		<u>Hours</u>
05/16/01 TP	Continued drafting letter to Honeywell requesting additional 30(b)(6) deponent and emailed draft to Mr. Hughes; emailed Mr. Hughes additional cites to Mr. Kyle's testimony; reviewed documents and designated ones for copying for Hague deposition and drafting outline for deposition; continued review of expert materials and phone calls to them for clarification on documents sent and to request that missing materials be sent immediately; office conference with Ms. Banks re having documents bates stamped and copied for production and request that she perform search for missing documents to determine if any have already been produced in the litigation; reviewed upcoming expert deposition schedule.	8.70
FPP	Convert expert report into electronic format; extract color photos from Dr. Anderson for conversion into electronic format.	3.80
NAB	File, index and scan correspondence.	5.00
RM	Discuss with Ms. Pelletier individual documents I had questions on; confer with Ms. Banks regarding Baker documents.	0.40
ACZ	Research for B. Hughes of case law related to RCRA's imminent and substantial endangerment requirement for citizen suits; discussions with C. Marraro, B. Hughes and A. Pelletier on N.J. Spill Act claims; research Spill Act case law.	5.40
AP	Conference with C. Marraro and B. Hughes regarding expert depositions; calls with plaintiff's counsel re stipulation; call with plaintiff's counsel re site visit.	3.70

W. R. Grace &amp; Co.

Page 22

		<u>Hours</u>
05/17/01 TP	Reviewed expert documents, office conferences with Ms. Pelletier, Banks and Manago re shipping documents on Monday; telephone conference with experts re missing materials that have not been received; email with Mr. Marraro re shipping documents to Mr. Agnello's office, and concerns voiced by experts re payment for services and costs to reproduce and ship documents; office conference with Mr. Marraro re privilege log issues and drafted letter to Honeywell counsel re same; designated documents to be copied for exhibits for Hague deposition and drafting outline; reviewed additional Hague documents recently produced to designate exhibits; office conference with Mr. Hughes re Honeywell's failure to produce document given to NJDEP on costs and drafted letter re same.	8.60
TM	Assisted Ms. Banks with the analysis of litigation-related documents produced by defendant; performed attorney search request; pulled and copied documents per the request of Mr. Marraro; organized case files; labeled red-wells; case management: analyzed new case documents and incorporate into case files.	7.50
ACZ	Review and research case law on whether court is government body, at request of M. Flax for cases.	0.40
BB	Consult with Mr. Marraro and Ms. Parker re analysis of litigation-related documents produced by defendant; assist in set up of production documents for plaintiff counsel's review; review and analyze defendants' deposition notices dates and expert availability chart, prepare summary and email to attorneys and local counsel for Mr. Marraro; research	12.70

W. R. Grace &amp; Co.

Page 23

		<u>Hours</u>
	Westlaw for pertinent case law for Mr. Hughes; research database.	
05/17/01 FPP	Convert expert report into electronic format; extract color photos for conversion into electronic format.	1.50
AP	Conference with B. Hughes re summary judgment briefing and expert depositions; call with S. German regarding stipulation and site visit.	1.80
WH	Work on motion for partial summary judgment on RCRA claim and statement of undisputed facts in support of same; confer with Gayle Koch re drafting expert report on NCP issues.	8.10
NAB	File, index and scan correspondence and file other case documents.	6.00
CHM	Prepare deposition schedule for experts; numerous phone conferences with experts re same; work on Section 107 summary judgment brief; conference with plaintiffs re Hackensack Riverkeepers case; review correspondence; prepare memoranda on case issues.	7.50
05/18/01 ACZ	Research of Third Circuit case law setting forth elements for demonstrating imminent and substantial endangerment in Third Circuit.	1.80
WH	Review all Honeywell-NJDEP correspondence provided to Ms. Koch in connection with her NCP expert report; confer with Ms. Koch and paralegal re same and identifying/collecting additional relevant documents; work on motion for partial summary judgment on RCRA claim; conferences with Mr. Marraro and Grace experts re scheduling expert depositions.	8.70

W. R. Grace &amp; Co.

Page 24

		<u>Hours</u>
05/18/01	NAB File, index and scan correspondence and file other case documents.	4.50
MM	Office conference with Mr. Marraro re producing James Wong's recent deposition transcript; search case material and produce copy of stated deposition transcript to Mr. Marraro for review; review correspondence received from Mr. Caffrey to Ms. Parker re databases identified during the deposition of Mr. Reese and Mr. Wong.	0.30
TM	Assisted Ms. Parker with deposition preparation for Hague; pulled and copied revelant documents to be used as potential exhibits; labeled folders; organized case files; reviewed incoming correspondence; copied and distributed documents to team members.	9.80
TP	Calls to experts to confirm that they had sent all documents that they had available; office conference with Ms. Pelletier and Ms. Banks re organization and labeling and shipping documents to Mr. Agnello's office for production; telephone conference with Mr. Marraro re strategy for shipping documents and arrangements for his review prior to production; reviewing documents, discovery response and deposition transcripts to prepare for Hague deposition; designated documents for exhibits for deposition; instructed Ms. Manago on preparation of exhibits.	7.90
AP	Review additional documents for supplemental production to Honeywell.	0.60
FPP	Convert expert report into electronic format; extract color photos for conversion into electronic format; discuss legal research	5.80

W. R. Grace &amp; Co.

Page 25

		<u>Hours</u>
	assignment with Mr. Hughes; index pleading file.	
05/18/01 CHM	Prepare letter to D. Field re "privilege log" deficiencies; work to complete expert deposition schedule; conference with Allied counsel re various issues; conference with client re various issues; review depositions produced by Honeywell.	7.00
05/20/01 TP	Completed draft outline for Hague deposition and organizing exhibits by subject and order that these subjects are to be considered at Hague deposition.	4.70
FPP	Engage in legal research and analysis of RCRA cases.	9.00
WH	Legal research re moving for summary judgment on Spill Act claim and Spill Act statute of limitations issues; revise RCRA motion to reflect Wong and Walerko testimony.	5.30
05/21/01 NAB	File, index and scan correspondence and file other case documents.	2.10
BB	Follow up on court reporter re upcoming depositions; prepare production of supporting documents for expert reports and supplemental documents for Ms. Pelletier; assist Mr. Pittman in researching production database and production files for pertinent document for Mr. Hughes; deliver production documents to FedEx After Hours office.	4.40

W. R. Grace &amp; Co.

Page 26

		<u>Hours</u>
05/21/01	CHM Travel to NJ for deposition preparation for Wong 30(b)(6) continuation; work on summary judgment brief; complete expert deposition schedule; dinner meeting with expert.	9.20
	TP Final preparation for deposition of Bill Hague, conducted deposition and returned home.	8.50
	FPP Create and submit memorandum of legal research findings for use by Mr. Hughes; review and analyze deposition transcript for specific information; engage in document review for COPR heaving report for Mr. Hughes; assist Mrs. Banks and Ms. Pelletier in document production.	9.30
	AP Serve amended deposition notices; conference with C. Marraro re production of expert documents; review, process and supervise production.	9.10
	WH Review and collect documents and prepare outline of questions in connection with Mr. Mararro's deposition of James Wong; confer with Mr. Marraro re same; continue drafting/revising RCRA summary judgment motion; confer with Mr. Zacaroli re Spill Act statute of limitations issues and related research assignment; confer with Mr. Caffrey re deposition scheduling.	8.10
	RLS Meet with T. Manago re case project; update case file; print documents from CD-ROM for A. Pelletier.	6.30
05/22/01	WH Review Ms. Koch's draft expert report on NCP issues and confer with Ms. Koch re same; legal research re NCP compliance issues related to Ms. Koch's expert report; work on RCRA summary judgment motion; confer with Ms.	9.60

W. R. Grace &amp; Co.

Page 27

Hours

	Sneed re research on common law claims and possibility of moving for summary judgment on same; review relevant NJ cases on strict liability issues; confer with Mr. Valera and Mr. Brown re their depositions.	
05/22/01 NAB	File, index and scan correspondence and file other case documents.	5.50
FPP	Engage in document review for COPR Heaving report for Mr. Hughes; convert document into electronic format for use by Mr. Hughes.	1.50
BB	Consult with Ms. Parker re production of supporting documents for expert reports; consult with Ms. Kelly re original expert documents; assist Mr. Pittman in researching production documents for pertinent document for Mr. Hughes; prepare email with pertinent information and forward to Mr. Hughes; incorporate supporting documents for expert reports into case files; prepare and email pertinent deposition transcript to Mr. Hughes; consult with Ms. Parker re follow up on experts' supporting documents and prepare cover letter and FedEx package for shipment; review new correspondence and provide direction to Ms. Campbell for incorporating into the existing case files.	6.20
AP	Calls with plaintiffs' counsel re deposition scheduling and expert documents; review plaintiffs' letter to court; conference with C. Marraro re plaintiffs' production of expert documents.	2.00
TP	Telephone conference with Messrs. Caffrey and Boenning re producing Grace expert witness opinion supporting documents; phone	2.70



W. R. Grace &amp; Co.

Page 28

Hours

calls to Andy Davis and Kirk Brown's offices to confirm that there are no copies of documents in their files that have been marked on and thus are not identical to those that were produced and email to Mr. Hughes re same.

05/22/01	CHM	Travel and meeting in Connecticut re litigation.	8.50
05/23/01	RLS	Scan document for C. Marraro and send via e-mail.	0.10
	NAB	File, index and scan correspondence and file other case documents.	3.60
	CHM	Attend 30(b)(6) deposition of Honeywell; prepare memo re same.	9.50
	BB	Continue to analyze and verify expert supporting documents and prepare and fax message for missing documents for Ms. Parker; place call to expert re same; analyze deposition transcripts; coordinate, organize and incorporate expert supporting documents into case files and prepare for scanning and copying; review new correspondence and case documents and prepare for incorporation into case files.	12.50
	AP	Conference with B. Hughes and C. Marraro re Motion for Summary Judgment on Grace Co. and Ltd.; review correspondence; review Honeywell's motion to exclude expert testimony.	2.50
	WH	Confer with Mr. Marraro re depositions and dispositive motions; research re CERCLA and RCRA operator standard in connection with moving for summary judgment on ICO's and Honeywell's claims against W.R. Grace Ltd. and W.R. Grace & Co.; confer with Ms.	7.90

W. R. Grace &amp; Co.

Page 29

		<u>Hours</u>
	Pelletier re drafting motion; prepare outline of same; revise RCRA motion.	
05/23/01 TP	Telephone conferences with Mr. Costa, Dr. Chapman, Dr. Belsito and Dr. Anderson re confirming that all documents, including any non-identical copies have been produced or will be sent immediately; office conference with Ms. Banks re status of documents produced and arrangements for Bates stamping and sending to Mr. Agnello's office for review by Honeywell counsel; telephone conference with Ms. Flax and Mr. Marraro re Honeywell's review of the documents sent; reviewed Honeywell's motion to preclude testimony by Dr. Anderson and telephone conferences with Messrs. Marraro and Hughes and email with Ms. Pelletier re same; office conference and email with Ms. Banks re data from Dr. Coast's office and her contacts with Dr. Goad re documents provided to experts.	3.10
MM	Telephone conference with Mr. Marraro re producing copy of the 30(b)(6) Notice and forward via fax for his review; office conference with Ms. Banks re same.	0.20
RLS	Scan document for C. Marraro and send via e-mail.	0.10
ACZ	Discussion with B. Hughes regarding research needed on Spill Act case law.	0.30
05/24/01 AP	Research in preparation for motion for summary judgment for Grace Co. and Ltd.; call with S. German re depositions; calls with Carella, Byrne re production of documents.	1.50

W. R. Grace &amp; Co.

Page 30

		<u>Hours</u>
05/24/01	NAB File, index and scan correspondence and file other case documents.	3.00
TP	Email to Mr. Marraro summarizing the status of producing all expert supporting documents and remaining issues to be resolved; drafted letter to Messrs. Caffrey and Boenning re producing Grace expert materials relied upon; telephone conference with Dr. Anderson re materials to be produced including calculations that support her opinions; telephone conference to Dr. Belsito's office re documents that were not included in their production to confirm that these are not available; office conference with Ms. Banks re status of production of expert documents and requesting that she search database to determine if documents relied upon have already been produced; email with Mr. Lawrence of EVS re documents that are being sent.	2.90
BB	Consult with Ms. Parker re follow up with expert re missing supporting documents for expert reports; research legal issue and collect and prepare pertinent caselaw in preparation for brief for Mr. Hughes; follow up with case expert re revised expert report.	7.60
FPP	Organize electronic expert reports on server.	2.30
WH	Review Honeywell's motion in limine to exclude expert testimony of Mr. McGuire and Ms. Anderson; confer with Mr. Marraro re same; prepare outline opposition to motion in limine; confer with Ms. Pelletier re motions and preparing Mr. Chapman and ICO experts for their depositions; further work on motion for summary judgment on imminent and	8.80

W. R. Grace &amp; Co.

Page 31

		<u>Hours</u>
	substantial claim; review transcript of latest 30(b)(6) deposition and revise motions re same.	
05/24/01 ACZ	Research pendent jurisdiction and supplement jurisdiction rules and case law in federal cases for B. Hughes; research case law on statute of limitations applicable in N.J. Spill Act claims.	2.30
05/25/01 CHM	Review deposition transcripts; change expert deposition schedule; meet with team and assign projects; review research on License Agreement; conference with clients.	8.50
NAB	File, index and scan correspondence and file other case documents.	5.50
TP	Telephone conference with Mr. Caffrey and email to Ms. Self and Ms. Banks re fax number for Mr. Caffrey; calls checking on status of documents being sent by EVS; telephone conference with Mr. Lape re Dr. Anderson's supporting documents; office conference with Ms. Banks re arrangements to have additional materials Bates stamped and produced and request that I be notified if any additional documents arrive.	1.90
RM	Follow up on document production status with Ms. Pelletier.	0.60
AP	Research in preparation for motions for summary judgment.	4.80
BB	Follow up with Ms. Kelly on expert report revisions; review and quality check Exhibit B entries for expert report; prepare expert supporting documents for duplication of working set for attorneys.	7.10

W. R. Grace &amp; Co.

Page 32

		<u>Hours</u>
05/28/01	WH Work on RCRA motion; review additional case law re obtaining summary judgment on imminent and substantial endangerment element; prepare for ICO deposition.	5.30
05/29/01	TM Analyze new documents and incorporate into case files; organize and label case files; search document database; assist Ms. Banks with the review and preparation of supplemental documents for production.	3.10
	CHM Supplement interrogatories to D. Field; review Honeywell interrogatory responses to Grace's fourth set; conference with client.	2.00
	BB Cross-reference and quality check Exhibit B entries against supporting documents for expert report for Mr. Hughes; review and quality check copy set of experts' supporting documents; review and prepare supplemental documents received from expert for duplication; make telephone calls; email and fax revised expert report for Mr. Hughes; assist Mr. Hughes with expert's report; download agency report for Mr. Hughes; review, coordinate and incorporate new pleadings into case files; research Westlaw for pertinent NJ statute(s) and statute language for Mr. Marraro and email same; respond to inquiry from new case expert for additional information; research Westlaw for pertinent cases for Mr. Hughes.	11.40
	TP Phone message from Mr. Marraro and call to his secretary re getting brief for review and editing; telephone conference with Dr. Anderson's office and review of emailed spread sheets of her calculations; reviewed additional supporting documents sent from EVS to prepare for production; office conference with	1.90

W. R. Grace &amp; Co.

Page 33

		<u>Hours</u>
	Ms. Banks re status of preparing documents to be sent to Honeywell counsel.	
05/29/01 AP	Calls with Terris Pravlik and CTEH regarding site visit.	0.90
NAB	Locate ICO and Honeywell's latest amended complaints and responses for Ms. Pelletier; scan expert reports for C. Marraro.	2.00
WH	Finalize Ms. Koch's expert report on NCP compliance issue; confer with Ms. Koch and paralegal re same; confer with Mr. McGuire re finalizing his rebuttal expert report on valuation/damages issues; prepare for ICO's 30(b)(6) deposition of Honeywell; travel to NJ for same.	10.60
05/30/01 CHM	Revise declaratory judgment section in Section 113 summary judgment brief.	2.20
DB	Case maintenance, re-filed case documents, as well as sent infrequently used documents off site.	7.50
BB	Update electronic case calendar for expert depositions; incorporate new expert documents into case files; create new pleadings file; review and incorporate edits into expert report and prepare fax re same; prepare report for service; consult with Messrs. Hughes and Zacaroli re expert report and place call and email message to expert's office re same; read and analyze new case documents and incorporate into case files.	10.80
ACZ	Discussion with B. Hughes re research of case law involving plaintiff summary judgment claims based on imminent and substantial endangerment under RCRA; review of expert	1.10

W. R. Grace &amp; Co.

Page 34

		<u>Hours</u>
	report; revisions to expert reports; make arrangements with B. Banks to service expert reports.	
05/30/01	WH Attend ICO's 30(b)(6) deposition of Honeywell; coordinate service of Grace's expert reports on Honeywell; confer with counsel for ICO re deposition; begin reviewing Honeywell's expert reports.	9.80
	TP Email to Ms. Banks re printing and preparing Dr. Anderson's spread sheets for production.	0.20
	AP Research re N.J. Spill Act "responsible party issues."	2.00
05/31/01	ACZ Research cases involving plaintiffs seeking summary judgment on RCRA liability based on presence of imminent and substantial endangerment; review relevant cases for B. Hughes.	2.70
	BB Respond to telephone inquiry from case expert and consult with Ms. Kelly re same; collect and prepare pertinent documents for Ms. Pelletier; place telephone calls to follow up on duplication of experts' supporting documents; review, coordinate, prepare and scan rebuttal expert reports and email and fax to case experts for review for Ms. Pelletier.	8.80
	WH Attend second day of ICO's 30(b)(6) deposition of Honeywell; confer with counsel for ICO and Roned Realty re deposition; finish reviewing Honeywell's expert reports; return travel to DC.	10.40
	TM Assisted Ms. Banks with the analysis of litigation-related documents produced by defendant; performed attorney search request; pulled and copied documents per the request of	2.50

W. R. Grace &amp; Co.

Page 35

Hours

Mr. Marraro; organized case files; labeled red-wells; case management: analyzed new case documents and incorporate into case files.

05/31/01 AP	Review and revise brief on anticipatory breach and license agreement; review affidavit of D. Cleary and call with A. Nagy re same; draft proposed declaration for J. McFarland re Co. & Ltd. liability; conference with P. Champman re toxicity data and review of publications.	7.60
CHM	Obtain expert reports; review 30(b)(6) deposition transcript of Wong (5/23); conference re expert deposition scheduling; review Allied production of "other litigation" documents.	6.50
FPP	Discuss assignment with Ms. Pelletier and Mr. Moasser regarding retrieval of reports for produced documents.	1.00

Amount

Total Fees	1052.30	\$237,937.00
------------	---------	--------------

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	178.00	130.00
Darlene Boozer, Legal Clerk	18.00	95.00
Natasha A. Bynum, Legal Clerk	49.20	95.00
William Hughes, Counsel	220.80	305.00
Keith Kaider, Paralegal	14.40	130.00
Christopher H. Marraro, Partner	141.50	420.00
Mahmoude Moasser, Paralegal	3.40	130.00
Rebecca Mitchell, Paralegal	20.70	115.00
Tonya Manago, Sr. Paralegal	40.70	130.00
Tamara Parker, Associate	112.10	260.00
Angela Pelletier, Associate	76.40	200.00
F. Paul Pittman, Paralegal	58.60	115.00
Letta Sneed, Associate	24.30	215.00



W. R. Grace & Co.

Page 36

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Reilly L. Smith, Paralegal	30.90	115.00
Alec C. Zacaroli, Associate	63.30	185.00

MATTER 9 - LIBBY, MT.  
FEES - MAY 2001

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

	<u>Hours</u>
04/09/01 CHM Conference calls with EPA staff.	0.80
04/25/01 CHM Conference call with J. Spinello; meeting with EPA general counsel.	2.50
05/07/01 CHM Conference with EPA.	0.50
05/08/01 CHM Meeting with D. Cleary regarding Libbey matters.	1.80
05/11/01 CHM Conference with EPA and Mr. Corcoran.	0.50
05/16/01 CHM Review articles and conference with EPA re possible meeting; conference with D. Cleary re same.	1.00
05/17/01 CHM Prepare agenda for EPA; conference with W. Corcoran re same; research articles on Libby to help prepare agenda.	2.80

W. R. Grace & Co.

Page 2

	<u>Hours</u>
05/23/01 CHM Review D. Cleary notes for Libby meeting.	0.50
05/30/01 CHM Conference with P. Goad re asbestos conference.	1.00

	<u>Amount</u>
Total Fees	11.40 \$4,788.00

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	11.40	420.00

**EXHIBIT B**

**BREAKDOWN OF EXPENSES FOR W.R. GRACE FOR MAY 2001  
BY CATEGORY**

<b>EXPENSE</b>	<b>TOTAL</b>
Air Fares	\$ 1,688.78
Amtrak	\$ 180.00
Auto Rental	\$ 55.95
CD Duplication	\$ 71.91
Copies - Outside	\$ 5,919.87
Copies- Internal	\$ 2,788.65
Delivery	\$ 299.37
Facsimile	\$ 252.75
FedEx	\$ 1,326.64
Hotels on Trips	\$ 1,357.64
Lexis	\$ 1,962.59
Long Distance	\$ 309.80
Meals on Trips	\$ 694.54
Meeting Costs	\$ 110.33
Misc. Travel	\$ 116.72
Parking on Trips	\$ 10.00
Postage	\$ 24.24
Retainer Fee for Expert Consultant	\$ 500.00
Taxis on Trips	\$ 288.50
Temporary Services	\$ 2,848.50
Westlaw	\$ 5,788.11
<b>TOTAL</b>	<b>\$26,594.89</b>

**MATTER 4 - BREWER ROAD  
EXPENSES - MAY 2001**

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Out-of-Pocket Expenses in Connection with Waterloo - Brewer Road Site - Matter 4

Disbursements:

	<u>Amount</u>
FedEx Costs	41.08
Long Distance Charges	9.47
Outside Copies	263.97
Postage	2.20
 Total Disbursements	 <u>\$316.72</u>



MATTER 5 - MOTOR WHEEL  
EXPENSES - MAY 2001

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: Lydia Duff, Esq.  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Out-of-Pocket Expenses in Connection with the Motor Wheel Site - Matter 5

Disbursements:

	<u>Amount</u>
Long Distance Charges	49.94
Total Disbursements	<u>\$49.94</u>

MATTER 6 - HONEYWELL  
EXPENSES - MAY 2001

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Out-of-Pocket Expenses in Connection with Honeywell Litigation - Matter 6

Disbursements:

	<u>Amount</u>
Air Fare New Jersey for Vasquez Deposition - 4/20/01	521.50
Air Fare New York/New Jersey - 5/14-15/01	483.00
Air Fare New York/New Jersey for Depositions - 4/29-5/1	481.50
Air Fare to NY/NJ for Deposition - 5/1/01	202.78
Amtrak to Newark, NJ - 5/20/01 for Deposition	180.00
Auto Rental in New York/New Jersey For Depositions-4/29-5/1	55.95
Copy Costs - Internal	2,788.65
Delivery Service	299.37
Facsimile Costs	240.00
FedEx Costs	1,285.56
Hotel New York/New Jersey - 5/14-15/01	264.34
Hotel for Meeting with Myskiw - 5/2/01	410.37
Hotel in NY/NJ for Deposition - 5/1/01	178.08
Hotel in New York/New Jersey For Depositions - 4/29-5/1	304.51
Hotel in Newark, NJ - 5/20/01 for Deposition	200.34
ImageNet - CD Duplication	71.91
LawResources - Temporary Services	2,848.50
Lexis Costs	1,962.59
Long Distance Charges	250.39

W. R. Grace &amp; Co.

Page 2

	<u>Amount</u>
Luncheon Meeting - 5/3/01	110.33
Meals on trips	694.54
Miscellaneous Travel Expenses	116.72
Outside Copies	5,655.90
Parking on trips	10.00
Postage	14.18
Retainer Fee for Expert Consultation	500.00
Taxis on trips	288.50
Westlaw	5,788.11
Total Disbursements	<u>\$26,207.62</u>

MATTER 9 - LIBBY, MT.  
EXPENSES - MAY 2001

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007  
Phone 202.204.1000  
Fax 202.204.1001

July 05, 2001

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12194

For Out-of-Pocket Expenses for Libby, Montana - Matter 9

Disbursements:

	<u>Amount</u>
Facsimile Costs	12.75
Postage	7.86
Total Disbursements	<u>\$20.61</u>